

# Exhibit 1

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

UNITED STATES OF AMERICA,  
Plaintiff,

v.

ZACKARY ELLIS SANDERS,  
Defendant.

Case No. 1:20-cr-00143

Judge T.S. Ellis III

**[PROPOSED] PROTECTIVE ORDER**

This matter, having come to the Court's attention on a Motion for Entry of a Protective Order and Discovery Order, and the Court, having considered the motion, and being fully advised in this matter, hereby enters the following Protective and Discovery Order:

1. This Protective Order governs all discovery material in any format (written or electronic), and information contained therein, that is produced by the defendant or the defendant's experts in discovery in the above-captioned case, including any copies that might be made of such materials.
2. Possession of copies of the discovery materials is limited to the government attorneys of record, and investigators, paralegals, law clerks, experts, and assistants of the attorneys of record (hereinafter collectively referred to as members of the prosecution team).
3. Nothing in this order should be construed as imposing any discovery obligations on the defendant that are different from those imposed by case law and/or Rule 16 of the Federal Rules of Criminal Procedure and the Local Criminal Rules.
4. Any discovery material, or information contained therein, that is filed with the Court in connection with pre-trial motions, trial, sentencing, or other matter before this Court,

shall be filed under seal and shall remain sealed until otherwise ordered by this Court.

This of course does not entitle either party to seal their filings as a matter of course. The parties are required to comply in all respects to the relevant local and federal rules of criminal procedure pertaining to the sealing of court documents.

5. Any violation of any term or condition of this Order by the prosecution team may result in that member of the prosecution team being held in contempt of court and/or being subject to monetary or other sanctions as deemed appropriate by this Court.
6. The prosecution team shall use discovery only for the preparation and litigation of this matter, and for no other purpose. Litigation of this matter includes all pretrial, trial, and post-trial proceedings in this Court, any appeals, and any motion filed by the defendant under 28 U.S.C. § 2255 (including any appeals of the disposition of such a motion). Upon the final disposition of this case, any materials designated subject to the Protective Order shall not be used in any way, in any other matter, absent a court order. All discovery shall remain subject to this Protective Order unless and until this Order is modified by the Court. Upon the conclusion of any appellate or post-conviction proceedings, the prosecution team shall either (1) return all discovery to the defendant or the defendant's expert (if pertaining to test materials or raw test data) within 10 days of the conclusion of the case before this Court, or, if an appeal is taken, upon completion of such an appeal, or (2) destroy all discovery and certify to the defendant that it has been destroyed.

IT IS SO ORDERED.

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Judge T.S. Ellis III  
United States District Judge

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Date